

EXHIBIT B

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UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

CIRIACO PUCILLO, - - - - -
Plaintiff(s),

v.

Civil Action
No. 03-CV-12359 MLW

METSO PAPER INC., AND
VALMET CONVERTING, INC.,
Defendant(s).

- - - - -

DEPOSITION OF GREG HAGOPIAN, a witness called by
counsel for the Plaintiff, taken pursuant to the
applicable rules, before Diane L. McElwee, Registered
Merit Reporter and Notary Public in and for the
Commonwealth of Massachusetts, at the Offices of
Proma Technologies, 24 Forge Park, Franklin,
Massachusetts, on Friday, February 4, 2005,
commencing at 1:10 PM.

JAMES GIBBONS & ASSOCIATES
617-428-0402

1 PRESENT:

2 Maureen Counihan, Esq.
3 67 South Bedford St., Suite 400 West
4 Burlington, MA 01803
5 for the Plaintiff

6 David L. Kelleher, Esq.
7 THELEN, REID & PRIEST, LLP
8 701 Pennsylvania Ave., N.W., Suite 800
9 Washington, DC 20004-2608
10 for the Defendants

11 Also present:

12 Frank H. Sereno, President, Proma Technologies

13 Nancy P. Johnson, PHR, Human Resources Manager,
14 Proma Technologies

1 A No.

2 MS. COUNIHAN: I have nothing

3 further.

4

5 CROSS EXAMINATION

6 BY MR. KELLEHER:

7 Q Mr. Hagopian, my name is David Kelleher. I
8 represent Metso Paper and Valmet Converting. I have
9 a few follow-up questions for you.

10 I know the table is a little awkward,
11 but I am going to ask you questions, and the court
12 reporter still needs to be able to hear, so if you
13 can face the middle of the table so she and I can
14 hear. Other than that you can stay right where you
15 are.

16 I would like get an understanding of
17 what your role is with regard to the electrical
18 systems on the machines at Van Leer and Proma
19 Technologies. As I understand your testimony from
20 this afternoon, there are four other licensed
21 electricians currently employed at Proma
22 Technologies; is that right?

23 A Yes.

24 Q Mr. Peavey, Mr. Costello, Mr. Price and

1 Mr. Garrish, right?

2 A Yes.

3 Q You are not a licensed electrician, but you
4 are a degreed electrical engineer, correct?

5 A Yes.

6 Q It sounds to me -- correct me if I am wrong,
7 but the role that's played here at Proma
8 Technologies, the first responders to an electrical
9 problem or trouble-shooting matter are the licensed
10 electricians, and then they bring you in if
11 additional analysis needs to be done? Is that how it
12 works?

13 A That's correct.

14 Q So on a day-to-day matter you do not
15 interact with the machines in terms of preventive
16 maintenance, correct?

17 A Not on a day-to-day basis, no.

18 Q You are not a first responder for repairs
19 for electrical systems?

20 A Correct.

21 Q Those are done by the licensed electricians?

22 A Yes.

23 Q Do you have to be a degreed electrician to
24 get a license, do you know? I am trying to sort out